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Attorney for Creditor,
U.S. BANK TRUST NATIONAL ASSOCIATION, AS TRUSTEE OF THE IGLOO SERIES III TRUST,
its successors and assigns

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:

Monte Keith Woods

DEBTORS,

U.S. BANK TRUST NATIONAL ASSOCIATION,

AS TRUSTEE OF THE IGLOO SERIES III

TRUST CREDITOR,

§ CASE NO.: 14-44925-elm13
§
§
§ CHAPTER 13
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RESPONSE TO NOTICE OF FINAL CURE

TO ALL PARTIES IN INTEREST AND TO THEIR ATTORNEYS OF RECORD:

U.S. BANK TRUST NATIONAL ASSOCIATION, AS TRUSTEE OF THE IGLOO SERIES III TRUST, (“**Secured Creditor**”) in the above-entitled Bankruptcy proceeding, hereby submits the following reply to Notice of Final Cure (“**Notice**”) filed on January 9, 2020, by the Chapter 13 Trustee, Pam Bassel.

Secured Creditor is entitled to receive payments pursuant to a Promissory Note which matures on February 8, 2038 and is secured by a Deed of Trust on the subject property commonly known as 2303 Stillmeadow Drive, Arlington TX 76014(the “**Property**”).

Secured Creditor agrees that all pre-petition arrears have been cured.

Secured Creditor does not agree that the Debtor, is current post-petition. The Debtor is due for the November 2019 post-petition monthly mortgage payment and all subsequent payments for a total post-petition default as follows:

Date	Payment Amount
11/1/2019	\$1,243.19
12/1/2019	\$1,243.19
1/1/2020	\$1,243.19
Total	\$3,729.57

A true and correct copy of the post mortgage modification payment history is attached hereto as **Exhibit “A”**.

Respectfully submitted,

/s/ Kristin A. Zilberstein
Kristin A. Zilberstein, Esq.
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COUNSEL FOR SECURED CREDITOR

Exhibit “A”

Loan Information	
Borrower	Woods
BK Case #	14-44925
Date Filed	12/5/2014
First Post Petition Due Date	
POC Covers	Loan Mod entered 5/1/19

[illegible]

CERTIFICATE OF SERVICE

On **January 27, 2020**, I served the foregoing documents described as **RESPONSE TO NOTICE OF FINAL CURE**, on the following individuals by electronic means through the Court's ECF program:

COUNSEL FOR DEBTOR

Christopher Marvin Lee
ecf@leebankruptcy.com

CHAPTER 13 TRUSTEE

Pam Bassel
fwch13cmecf@fwch13.com

U.S. TRUSTEE

United States Trustee
ustpreion06.da.ecf@usdoj.gov

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ Enrique Alarcon
Enrique Alarcon

On **January 27, 2020**, I served the foregoing documents described as **RESPONSE TO NOTICE OF FINAL CURE**, on the following individuals by depositing true copies thereof in the United States mail at Santa Ana, California enclosed in a sealed envelope, with postage paid, addressed as follows:

DEBTOR

Monte Keith Woods
2303 Stillmeadow Drive
Arlington, TX 76014

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ Enrique Alarcon
Enrique Alarcon